

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

MICHAEL J. QUILLING, Receiver	§	
for Megafund Corporation and Stanley A.	§	
Leitner,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:06-CV-1088
	§	ECF
	§	
ALLAN CLARK, Individually and	§	
d/b/a FINANCIAL RISK SPECIALISTS,	§	(JURY TRIAL DEMANDED)
Defendant.	§	

**MOTION TO APPROVE AGREED ORDER
EXPANDING DEADLINE FOR DEFENDANT’S ANSWER**

TO THE HONORABLE ED KINKEADE, UNITED STATES DISTRICT COURT JUDGE:

COMES NOW, Michael J. Quilling, as Receiver for Megafund Corporation and Stanley A. Leitner, (“Plaintiff”) and requests that this Court issue an Agreed Order expanding the deadline for Defendant’s Answer until July 31, 2006, and in support of such would respectfully show unto the Court as follows:

1. The parties are in settlement negotiations and anticipate reaching a final resolution of this matter by July 28, 2006 and wish to avoid the necessity of having to file further pleadings until that time.
2. To accommodate these negotiations, the parties have both consented to entry of an Agreed Order expanding Defendant’s answer date to July 31, 2006.

WHEREFORE, PREMISES CONSIDERED, Plaintiff requests that upon final consideration of this matter that this Court issue an Agreed Order, attached hereto as Exhibit “A”, and for such

other and further relief, general or special, at law or in equity, to which he may show himself justly entitled.

Respectfully submitted,

QUILLING SELANDER CUMMISKEY & LOWNDS, P.C.
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Dallas, Texas 75201-4240
(214) 871-2100 (Telephone)
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By: /s/ Brent J. Rodine

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ATTORNEYS FOR RECEIVER

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of July, 2006 a true and correct copy of the above and foregoing motion was served, via first class mail, with full and proper postage prepaid thereon, to:

Allan Clark
Financial Risk Specialists
5215 North O'Connor Boulevard, Suite 200
Irving, Texas 75039

/s/ Brent J. Rodine